Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

In the Matter of	)	
	)	
Advanced Television Systems	)	
And Their Impact Upon the Existing	)	MB Docket No. 87-268
Television Broadcast Service	)	

To: Office of the Secretary
Federal Communications Commission

COMMENT

WKYC-TV, Inc. ("WKYC"),[1] licensee of WKYC-TV, Cleveland, Ohio, by its attorneys, submits the following comment in the above proceeding.

WKYC-TV operates on analog Channel 3 and was initially assigned digital Channel 2.[2] In round 2 of the DTV channel election process, WKYC elected Channel 17 for its post-transition DTV operations. The request for Channel 17 has been referred to Canada for coordination and is under negotiation to determine the extent to which radiation directed toward Canada will need to be reduced in order to obtain Canada's concurrence. WKYC has been informed by Commission staff of the parameters requested by Canada. Those parameters are described in the attached statement by Richard H. Mertz of Cavell, Mertz & Associates, Inc., WKYC's consulting engineers. These comments are intended to memorialize WKYC's understanding of the technical

---

1 WKYC is an indirect wholly-owned subsidiary of Gannett Co., Inc.

2 *Advanced Television Systems and Their Impact upon the Existing Television Broadcast Service,* Sixth Report and Order, Appendix B, FCC 97-115, rel. April 21, 1997.

parameters under discussion and to advise the Commission that those parameters are acceptable to WKYC.

Respectfully submitted,

WKYC-TV, INC.

By: /s/ Marnie K. Sarver
Marnie K. Sarver

Wiley Rein LLP
1776 K. Street NW
Washington, DC 20006
(202) 719-4289
(202) 719-7049 (fax)

October 25, 2007

Its Attorneys

Engineering Statement
MODIFICATION OF ALLOTMENT
prepared for
WKYC-TV, Inc.
WKYC-DT Cleveland, Ohio
Facility ID: 73195
Ch. 17 1000 kW (MAX-DA) 296 m

WKYC-TV, Inc. (*"WKYC"*) is the licensee of television station WKYC-TV, analog Channel 3 (BLCT-19981214KE), digital Channel 2[1] (BLCDT-20020404AAW), Cleveland Ohio. As the Commission is aware, consultations are currently underway with Canadian officials to coordinate U.S. digital television assignments in the border area. *WKYC* has been cooperating with Commission Staff in this coordination effort. The instant engineering statement documents *WKYC*'s understanding of the technical parameters under discussion.

WKYC was informed by Commission Staff that Canadian officials had recommended that the current WKYC-DT Channel 17 allotment directional antenna pattern, FCC antenna ID 72095, be modified to specify a relative field value of 50% over the arc from 310° to 40° relative to True North. An engineering study was performed using the recommend reduction in signal towards Canada and a relative field value of 100% in all other directions. The results of the study indicated that predicted interference to pertinent domestic stations was not increased in excess of the 0.1% limit. The antenna pattern documented herein will serve to minimize problems in selecting an actual antenna system.

Attached is Table I, Allotment Parameters. This table restates the pertinent parameters in Appendix B[2] for WKYC-DT and provides a tabulation of the antenna relative field antenna pattern under discussion. Figure 1 provides a polar plot of the antenna relative filed pattern properly oriented relative to True North.

Certification

The undersigned hereby certifies that the foregoing statement was prepared by him or under his direction, and that it is true and correct to the best of his knowledge and belief. Mr. Mertz is a principal in the firm of *Cavell, Mertz & Associates, Inc.*, holds a Bachelor of Science

[1] WKYC-TV has been allotted DTV Channel 17 for its post-transition operation (BSRCCT-20060323AEO).
[2] See *"Seventh Report and Order and Eight Further Notice of Proposed Rule Making, Advance Television Systems and their Impact Upon Existing Television Broadcast Service"*, MB Docket No. 87-268, FCC 07-138.

degree from Oglethorpe University, and has submitted numerous engineering exhibits to the Federal Communications Commission. His qualifications are a matter of record with that agency.

Richard H. Mertz
October 24, 2007

Cavell, Mertz & Associates, Inc.
7839 Ashton Avenue
Manassas, VA 20109
(703) 392-9090

Attachments

Table I	Allotment Parameters
Figure 1	Proposed Ch. 17 Antenna Relative Field Envelope Pattern

Table I

ALLOTMENT PARAMETERS

prepared for

WKYC-TV, Inc.

WKYC-DT Cleveland, Ohio

Facility ID: 73195

Ch. 17 1000 kW (MAX-DA) 296 m

Site Coordinates	41° 23' 10" N 81° 41' 21" W (NAD-27)
Radiation Center	568 meters above mean sea level 296 meters above average terrain
Effective Radiated Power	1000 kilowatts

Directional Antenna Relative Field Pattern

Azimuth (°T)	Relative Field	Azimuth (°T)	Relative Field
0	0.500	180	1.000
10	0.500	190	1.000
20	0.500	200	1.000
30	0.500	210	1.000
40	0.500	220	1.000
50	1.000	230	1.000
60	1.000	240	1.000
70	1.000	250	1.000
80	1.000	260	1.000
90	1.000	270	1.000
100	1.000	280	1.000
110	1.000	290	1.000
120	1.000	300	1.000
130	1.000	310	0.500
140	1.000	320	0.500
150	1.000	330	0.500
160	1.000	340	0.500
170	1.000	350	0.500

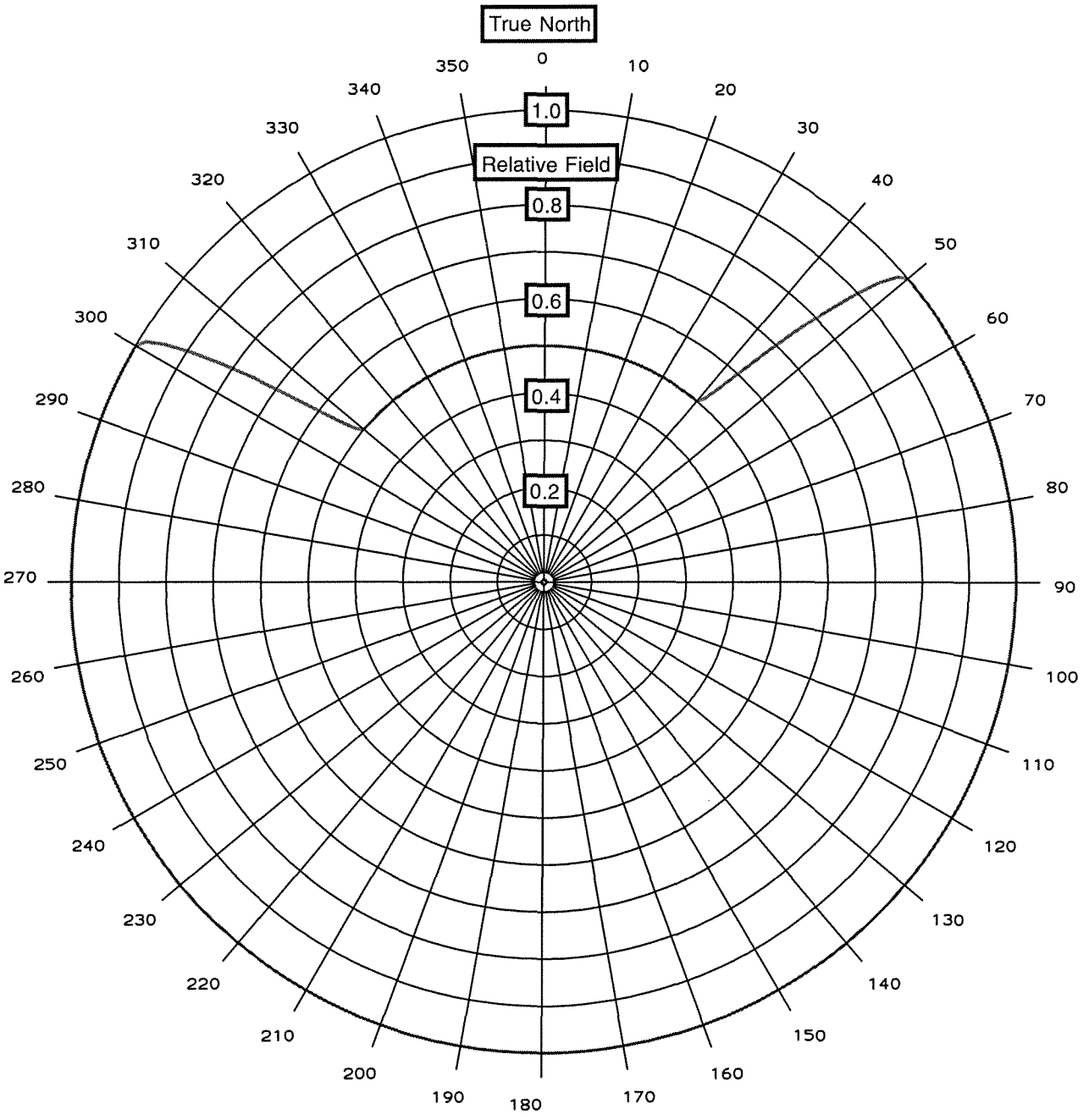

FIGURE 1
PROPOSED Ch. 17 ANTENNA
RELATIVE FIELD
ENVELOPE PATTERN

prepared October 2007 for
WKYC-TV, Inc.
WKYC-DT Cleveland, Ohio
Ch. 17 1000 kW (MAX-DA) 296 m

Cavell, Mertz & Associates, Inc.
Manassas, Virginia